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Jun 17 2024

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

Case No. 2021-CP-10-05645
Appellate Case No. 2024-000064

The Charleston School of Law, LLC,
a South Carolina limited liability company,

Respondent,

v.

City of Charleston, a municipal corporation, and
Omshera Hotel Group, LLC, a North Carolina limited liability company,

Defendants,

Of which City of Charleston, a municipal corporation, is the

Appellant.

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF APPELLANT**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Wilbur E. Johnson (SC Bar No. 3062)
Brian L. Quisenberry (SC Bar No. 73637)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Appellant

NOW COMES Appellant, City of Charleston, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby moves for a second extension of thirty (30) days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court dated May 20, 2024, the deadline for Appellant's initial brief and designation of matter is today, June 17, 2024. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 30 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it a second extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving the initial brief and designation of matter would be July 17, 2024, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[Signature on next page]

*[Signature page for Second Motion for Extension of Time to file/serve Initial Brief
of Appellant, Appellate Case No. 2024-000064]*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Appellant

Charleston, South Carolina

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Defendants,

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, City of Charleston, a municipal corporation, hereby certify that Appellant's **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on June 17, 2024, by emailing (see attached email) a copy of the same to their counsel of record:

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Omshera Hotel Group, LLC,
a North Carolina limited liability company*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellant

Charleston, South Carolina

June 17, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: bhagood@rosenhagood.com; dblanchard@rosenhagood.com; mhmoore@rosenhagood.com; [Capers Barr III](#)
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Subject: CSOL v. City of Charleston; Appellate Case No. 2024-000064 (CR 210151)
Date: Monday, June 17, 2024 3:43:16 PM
Attachments: [2nd Motion for Extension - Initial Brief.pdf](#)
[image001.png](#)

Enclosed please find Appellant's Second Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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